

EXHIBIT A
AMICUS BRIEF OF REV. ANNE ARMSTRONG
to MOTION FOR LEAVE TO FILE AMICUS of 2/24/25

<u>STATE OF RI, et al</u>	:	
v	:	Case No.
<u>DONALD TRUMP, et al</u>	:	C.A. No. 25-cv-39-JJM-PAS
	:	

AMICUS BRIEF OF REV. ANNE ARMSTRONG

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TABLE OF AUTHORITIES

As per Rule 29(4)(B), here is the table of authorities with brief's page numbers

Anne Armstrong v Gina Raimondo et al, 20-cv-00509-JJM-PAS (2020) pp. 3 and 5

Armstrong and Gordon v Peter Neronha et al, 1:24-cv-00066-MSM-PAS (2024-) p. 3

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Bushell's Case (1670) 124 E.R. 1006 p 4

CONCISE STATEMENT OF IDENTITY, INTEREST AND AUTHORITY SOURCE (with
no argument, as it becomes self-evident)

As per Rule 29(4)(B), here is the statement of identity, interest and authority

1. I am Rev. Anne Armstrong, Deaconess to (not representing) The Healing Church IN RI, and a person well known to the RI Attorney General. My authority is by leave of this Hon. Court.
2. As stated in the Motion for Leave to file, I am a frequent political and legal opponent of the RI AG, which is pertinent here for a few reasons.

3. One is that the RI AG not long ago argued -- before your Honor, in this very Court -- the opposite perspective than in this instant (RI v Trump) case, against me (in a Covid shutdown challenge, to pray rosaries in the Statehouse), in Anne Armstrong v Gina Raimondo et al, 20-cv-00509-JJM-PAS (2020). This case is hugely relevant because your Honor's wisdom resulted in a solution satisfying all parties, even as you denied the injunction I sought, and that may be an option in the RI v Trump case, as well.
4. Another reason is that as a legal opponent of the RIAG's, in Hon. Mary McElroy's federal RI District Court in Armstrong and Gordon v Peter Neronha et al, 1:24-cv-00066-MSM-PAS (2024-):
 - A. I noted to that Court that the RI AG's office, very similar to what just happened in the 21st February 2025 hearing before your Honor, instructed a female Assistant AG (who serves at the AG's pleasure and can be fired without cause, ironically) to represent a party who had no statutory right to AG representation -- the person of Peter Neronha, regarding torts he was accused of having committed before he was employed by the State of RI, in that case. In the instant (RI v Trump) case, as your Honor noted as a matter for concern in last Friday's hearing, the female RI Assistant AG seems again to have possibly been instructed to represent parties beyond their statutory authorization, the NGOs.
 - B. I fought against the RIAG's attempt to Dimsiss my lawsuit with reference, to Hon. Mary McElroy in 1:24-cv-00066-MSM-PAS (2024-), that when describing a pattern of

behavior conducted by an *enterprise*, affecting me as a racketeering Plaintiff against the RIAG's person and/or office, that I was somehow representing, without authority to do so, other victims of the pattern complained of. This is beyond ironic, in the circumstances, given their pattern of doing that of which they errantly accuse others.

5. The final interest is more of a conflict than a stake, but a huge stake it still is. As stated in the Motion for Leave, the RIAG was a 2018 election opponent of a man (Rev. Alan Gordon) to whom I served as Campaign Manager and Treasurer, and is the RIAG has been badly lawfaring against me ever since, in State of RI v Armstrong and Gordon, K2-2018-0069A/B (2018-). As specified in the Motion for Leave, the filings of that case show:

- A. The RI AG, who recused, personally appointed his own successor 6 years in a row, afoul of basic rules for independence, State ethics law and SCOTUS as cited in US v Trump, Nauta, and de Oliveira 23-80101-CR (2024).
- B. The criminal Complaint cites a statute doctored by the RI AG to significantly widen its scope *ex post facto*, by adding words which the legislature did not include, a deed unseen since the dastardly fake-law case of the English Crown against William Penn (Bushell's Case (1670) 124 E.R. 1006).

6. While the filings in that State criminal case, and in the federal RICO complaint against the RI AG, show a lot more misdeeds and errant executive power grabs than those mentioned, those

which have been mentioned are so pertinent to the ongoing instant *RI v Trump* matter, the case risks *per incuriam* injustice and appealability, if they are not brought to bear.

7. Most importantly of all, this Hon. Court is asked to view the Voluntary Dismissal of Anne Armstrong v Gina Raimondo et al, 20-cv-00509-JJM-PAS (2020). In that case, your Honor did not grant me the desired injunction against a perceived executive overreach (covid shutdown of Statehouse, inhibiting annual rosary prayer), but in denying the injunction, offered such wisdom and kindness that I found a workaround. It is incumbent upon me to return the favor in any small way I can, and I pray this reminder helps the parties in the instant *RI v Trump* case likewise achieve an out of court solution satisfactory to the rights and wishes of all, just as your Honor inspired the parties to do in 20-cv-00509-JJM-PAS (2020).

RULE 29(4)(E) DECLARATION

- (i) No party's counsel authored the Brief in whole or in part.
- (ii) Neither any party, nor their counsel, provided any money intended or used to fund preparing or submitting the brief,
- (iii) No person contributed any money intended or used to fund the brief.

RULE 32(G)(1) COMPLIANCE CERTIFICATE

This filing is 1034 words, including Service Certificate, per Microsoft Word counting protocol.

Humbly submitted,

Rev. Anne Armstrong

[signature]

[date]

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CERTIFICATE OF SERVICE

I, **Rev. Anne Armstrong**, affirm that the above document was on
 2025 electronically served upon all the parties, via counsel, upon filing,
by the electronic filing system.

.

Rev. Anne Armstrong

s/Anne Armstrong/

[signature]

[date]